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August 16, 2022

VIA ECF

JUDGE KIYO A. MATSUMOTO

United States District Court Eastern District of New York

225 Cadman Plaza East

Brooklyn, New York 11201

RE: **Case 1:22-cv-02069-KAM-JRC**
Jordan Posyer v. A.B.C. Tank Repair & Lining, Inc., A. Iengo Tank
Cleaning Co., Inc., and Robert Iengo (a/k/a Roberto Iengo)

Hon. Judge Matsumoto:

Our office was recently retained by the defendants in this action. We are in contact with the Plaintiff's counsel and we are working in good faith to resolve this matter.

From our review of the electronically filed documents on this matter, this Court issued a Certificate of Default against the two corporate defendants (Doc. No. 14) and on or about July 6, 2022 Plaintiff filed a motion for a default judgment against the same.

We respectfully request that the Plaintiff's motion be briefly held in abeyance for two weeks / fourteen (14) days so that the parties could, in good faith, try to amicably resolve this matter. A brief period of abeyance would provide parties with an opportunity to discuss their respective position with minimal prejudice to the Plaintiff. This abeyance period had been consented to by the Plaintiff's counsel.

Alternatively, we respectfully request a conference with the Court to set a briefing schedule for the Plaintiff's motion for a default judgment.

Thank you for your attention to this matter

Respectfully yours,

Yoram Nachimovsky, Esq. (YN6103)

cc: Jason Mizrahi, Esq. (VIA ECF)